

Attachment A- Proposed Discovery Plan Under Rule 26 (f)

I. Rule 26(a) Disclosures

Counsel anticipate completing the self-executing disclosures on December 31, 2002, as required by Rule 26 (a)

II. Discovery Subjects and Timetable for Discovery

(A) Counsel agree that the subjects for discovery include:

- (i) depositions of parties and witnesses
- (ii) Interrogatories
- (iii) Request for Production of Documents
- (iv) exchange of expert reports

(B) Counsel also agree upon the following discovery timetable:

- (a) Close of all discovery 5/30/03
- (b) Close of fact discovery 4/30/03
- (c) Expert reports due 5/15/03; Rebuttal reports due 5/30/03;
depositions of all experts to be completed by 5/30/02
- (d) Dispositive motions due: 6/15/02
- (e) Exchange of exhibits due: 6/16/03
- (f) Plaintiff's pre-trial memorandum due: 7/30/03
- (g) Defendant's pre-trial memorandum due: 8/14/03
- (h) All motions in limine due: 9/1/03
- (i) All responses to motions in limine due: 9/15/03
- (j) A Daubert or Markman hearing shall be held N/A
- (k) Final pre-trial conference to be held on 10/5/03

III. Changes in Limitations on Discovery

Counsel agree that discovery should be conducted in accordance with the parameters set forth in the Federal Rules of Civil Procedure, subject to modification by agreement of the parties or by Court order, as necessary under the circumstances.

IV. Alternative Dispute Resolution

- (A) type of ADR, settlement conference etc.
- (B) timing of ADR
- (C) unless otherwise recommended, a settlement conference will be scheduled upon the close of all discovery

V. Other Issues

(e.g. protective orders, etc.)

Plaintiff intends to seek preliminary relief requesting an accounting for the inventory at the Jeffersonville Golf Club Professional Shop owned by the Plaintiff and confiscated by the Defendant, West Norriton Township.

Signed,

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